Opportunities for Public Involvement

Fact Sheets and Public Comment Periods

This fact sheet will be distributed to nearby residents and others likely to be interested in the RFI at NNMC. A mailback survey is enclosed to help us find out other information and distribution methods of interest to community members.

Additional fact sheets will be distributed before RFI field sampling activities begin. If the Navy finds that additional interim measures are needed, another fact sheet will be prepared to notify the local community before work starts.



If you do not wish to receive future fact sheets by mail, please fill out and return the mail-back form included with this fact sheet.

After EPA approves each of the Priority I-IV RFI reports, a summary will be distributed to local government agencies and other interested people. RFI reports and other final documents will be made available for review on request.

At the Corrective Measures Study stage, there will be a formal public comment period before decisions about cleanup approaches are made. EPA will prepare a Statement of Basis (summary fact sheet) to describe the proposed response actions. Public notices in local newspapers will announce public comment periods, as well as any public meetings or workshops.

Acronyms in this fact sheet	
AOC	Area of Concern
CAP	Corrective Action Permit
СМІ	Corrective Measures Implementation
CMS	Corrective Measures Study
EPA	US Environmental Protection Agency
IR	Installation Restoration
MDE	Maryland Department of the Environment
NNMC	National Naval Medical Center
RAB	Restoration Advisory Board
RCRA	Resource Conservation and Recovery Act
RFA	RCRA Facility Assessment
RFI	RCRA Facility Investigation
SWMU	Solid Waste Management Unit

Availability of Documents

In the past, MDE and EPA have put copies of RCRA permits and related documents in the Chevy Chase Library during public comment periods. If enough interest exists, a long-term public information repository will be set up to make RFI documents available. (Libraries have limited shelf space and cannot keep documents not being used.)

If a long-term public information repository is not set up, documents will continue to be placed in a library temporarily during public comment periods.



Restoration Advisory Board

If enough community members are interested, a Restoration Advisory Board (RAB) could be established at NNMC. With regular participation by community members, a RAB can be a valuable link between the public and the cleanup decision-makers (Navy, EPA and

RAB members are local residents, who serve as volunteers. RAB members attend regular meetings, review documents, provide advice and feedback about community concerns to the Navy, and contribute to an ongoing dialog with the local community.

If you might be interested in becoming a RAB member, please fill out and return the mail-back form.

How to Get More Information

Please feel free to contact us at any time during the study process if you have any questions or concerns about our environmental programs.

> **Public Affairs Office National Naval Medical Center** 8901 Wisconsin Avenue Bethesda, MD 20089-5600 Phone: 301-295-5727

General information about NNMC and about EPA's RCRA corrective action process can be found on these websites:



NNMC: http://www.nnmc.med.navy.mil



EPA: http://www.epa.gov/reg3wcmd/



RESOURCE CONSERVATION AND RECOVERY ACT FACILITY INVESTIGATION COMMUNITY FACT SHEET

NATIONAL NAVAL MEDICAL CENTER BETHESDA, MD



Spring 2002

The U.S. Navy is beginning an environmental investigation at the National Naval Medical Center (NNMC) in Bethesda, Maryland. This investigation will be conducted in cooperation with the U.S. Environmental Protection Agency (EPA) and the Maryland Department of the Environment (MDE). NNMC recognizes its obligation to protect the environment, and we are committed to being a good neighbor. This fact sheet is to inform the local community about the upcoming investigation; to answer some of the questions that our neighbors may have and let them know how they can find more information; to gauge the level of public interest in this investigation; and to facilitate communication with the public. A mail-back form is provided, for those who would like to offer feedback.

Introduction

National Naval Medical Center

NNMC is located in Bethesda, 2 miles northwest of Washington, D.C. The 243-acre property is a medical and research campus. Neighboring properties include the National Institutes of Health, a private school, a country club, residential neighborhoods, and the Capital Beltway

The Naval Hospital at NNMC is one of the largest hospitals in the country, which provides health care for military beneficiaries and the Nation's leaders. NNMC also provides support services for several commands, medical foundations, and research organizations. In addition, NNMC facilitates cooperation between military and civilian authorities for public health issues, disaster response, and other emergencies.

Installation Restoration Program

Medical and research activities at NNMC generate a variety of wastes. Like many other private and government facilities, NNMC has some areas of contamination left behind by accidental spills or past wastehandling practices.

Although those practices were in compliance with regulations at the time, changing times have brought about new regulations and approaches to handle and dispose of wastes in an environmentally sound manner.

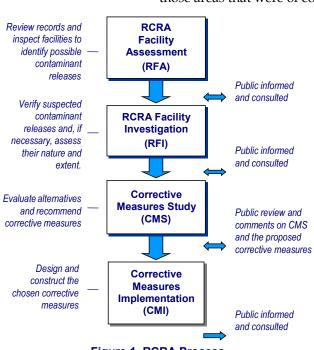
The purpose of the Navy's Installation Restoration (IR) program is to determine whether or not past disposal activities have adversely affected the environment and, if so, to take any corrective measures needed to protect human health and the environment.

RCRA Permit

The Resource Conservation and Recovery Act (RCRA) is the federal law under which EPA regulates permitted facilities that store, treat, or dispose of hazardous wastes. In December 2000, NNMC renewed its RCRA permit to operate a storage building where hazardous wastes are collected and temporarily stored before being taken off site for disposal.

Corrective Action Process

During the RCRA permit renewal process, the EPA conducted a RCRA Facility Assessment (RFA) at NNMC to identify any potential releases from previous disposal activities. As a result of this investigation, the EPA issued a Corrective Action Permit as a condition to the RCRA Permit renewal, in which NNMC is required to further investigate those areas that were of concern to the EPA.



to select and implement a

Figure 1 illustrates the RCRA corrective action process. The objective is to evaluate the nature (what type) and extent (how much and how large an area) of contamination that exists at a site and, if necessary,

The RCRA Corrective Action

will conduct a RCRA Facility

Investigation (RFI) of possible

that were identified in the

RCRA Facility Assessment

RFI Report.

corrective action.

contaminant releases at NNMC

(RFA) phase. The results will be

reported to EPA and MDE in an

Permit describes how the Navy

Figure 1. RCRA Process

Description of Sites

Twenty-two Solid Waste Management Units (SWMUs) and 10 Areas of Concern (AOCs) at NNMC will be investigated under the RCRA Corrective Action Permit.

A SWMU is defined as an area where solid wastes have been placed or released into the environment, whether or not the wastes are considered hazardous. SWMUs require further investigation and possible corrective action.

An AOC is an area that could be contaminated, based on available information about its previous use, but is not clearly linked to waste management activities. AOCs should be examined to find out if a release of hazardous material has occurred.

The SWMUs and AOCs identified at NNMC include:

- Former temporary storage areas, where waste chemicals and materials were stored until transported off site for disposal.
- Areas where waste-reduction equipment was formerly operated.
- Old waste disposal areas, mostly used before the 1970s.
- Current or former locations of underground or above-ground storage tanks.

In the past, when old tanks were removed at some of these areas, the soil was not tested (which is routinely done now) to confirm that no spills or leaks had occurred while the tank was in place.

- Areas where spills or releases of hazardous materials occurred in the past. These areas were cleaned or contained at the time of the incident. These same areas will be examined to confirm that no further cleanup is needed.
- The stormwater sewer system, which collects stormwater from parking lots and paved areas.

Where Are We Now?

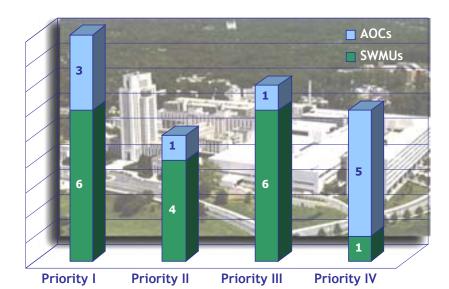
The first stage in the RCRA Corrective Action process, the RFA, was completed by the EPA. Planning for the second stage in the RCRA Corrective Action process, the RFI to be completed by the Navy, is currently underway.

In RFI planning, the objectives, technical approach, and schedule for a site investigation are defined. The Navy consults with EPA to decide where and how samples will be collected, and how the samples will be analyzed. The final plan will be submitted to EPA soon.

Prioritizing the Sites

Based on preliminary evidence gathered during the RFA, the SWMUs and AOCs identified at NNMC have been divided into four priority groups, according to their relative risk to human health and the environment, for investigation during the RFI.

The priority ranking of the sites at NNMC will be reviewed and updated as more information is developed.



Does not include 5 SWMUs that have been recommended for No Further Action, pending EPA approval.

What Happens Next?

Priority I Sites

The Priority I RCRA Facility Investigation will include six SWMUs and three AOCs. Fieldwork is currently scheduled to start by Summer 2002. At sites where contamination is found, the sampling data will be evaluated to determine the nature and extent of the contamination. Human health and ecological risk assessments will be performed and background conditions will be studied.

Soil and groundwater samples will be collected at the Priority I sites. Sediment and surface water samples will be collected from Stoney Creek. Samples also will be collected at locations typical of background environmental conditions at NNMC, for insight into the range of naturally occurring metals in the soil.

Corrective Measures Study

Depending on the results of the Priority I RFI, a Corrective Measures Study (CMS) might be prepared. The CMS will develop and evaluate response alternatives for each site found to pose human health or ecological risks.

After EPA reviews the CMS and tentatively selects the preferred alternative (which could include a corrective action or no further action), EPA will ask the public for comments on both the CMS report and the recommended action. Once EPA has reviewed and considered public comments, the response action will be selected.

Priority II–IV Sites

The investigation of the Priority II–IV sites will follow the same process as the Priority I sites. The RFI for Priorities II, III, and IV are expected to start at roughly annual intervals, beginning in 2003.

RCRA Interim Measures

At any time during the investigation, the Navy (in consultation with EPA and MDE) can take Interim Measures to stabilize a site or prevent exposure to hazardous substances. Interim Measures are designed to protect human health and the environment until the full RCRA study and corrective action process can be completed. They can include fences and warning signs to keep people away from contaminated areas; institutional controls, such as prohibiting ground disturbance in a particular area; or, if necessary, physically removing "hot spots" of contaminated soil or water.

If hazardous substances at levels above EPA's health-based thresholds are found to have moved beyond NNMC's boundaries in air, surface water, or groundwater, the Navy will promptly notify both EPA and nearby residents or landowners.

Interim Measures at Buildings 17, 18, and 21

Buildings 17, 18, and 21 are all part of a revitalization project. Mercury, which was routinely used in medical research, was encountered during a site visit to one of these buildings. NNMC is now in the process of implementing Interim Measures under the RCRA Corrective Action Permit, to remove mercury and eliminate any potential health risk of exposure to future occupants of these buildings.

Removal of Drainage Piping and Sampling

NNMC will remove the potentially contaminated drainage piping from Buildings 17, 18, and 21.

After removing the drainage piping, the Navy will collect soil samples and analyze the soil for mercury. If necessary, contaminated soil will be excavated, and additional sampling will be performed to verify that soil containing mercury at levels above regulatory requirements has been removed.

If necessary, monitoring wells will be installed and sampled near these buildings. All sampling data will be reported to EPA, to determine if further data evaluation may be necessary or if no further action is required.

Disposal of Materials Removed

Representative samples of removed piping materials and excavated soil will be sent to an offsite laboratory for testing.

Any material that is determined to be hazardous will be transported off site, by a licensed hazardous waste hauler, to a permitted hazardous waste landfill. All other material will be taken off site for proper disposal as non-hazardous waste or for recycling, as appropriate.

Schedule for Interim Measures

The EPA has reviewed and approved the work plan for these interim measures at Buildings 17, 18 and 21. Fieldwork is expected to last from the Spring through the Fall of 2002.

2